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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
\_\_\_\_\_  
DIVISION

Plaintiff(s),

Kinza Abdul Salaam

v.

Transstates Airlines  
LLC

Case No. \_\_\_\_\_

(to be assigned by Clerk of District Court)

JURY TRIAL DEMANDED

YES ☐ NO ☒

Defendant(s). (Enter above the full name(s)  
of all defendants in this lawsuit. Please  
attach additional sheets if necessary.)

**EMPLOYMENT DISCRIMINATION COMPLAINT**

1. This employment discrimination lawsuit is based on (check only those that apply):

X Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, gender, or national origin.  
**NOTE:** *In order to bring suit in federal district court under Title VII, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

\_\_\_\_\_ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age (age 40 or older).  
**NOTE:** *In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.*

\_\_\_\_\_ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.  
**NOTE:** *In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a right-to-sue letter from the Equal Employment Opportunity Commission.*

\_\_\_\_ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

**NOTE:** *In order to bring suit in federal district court under the Rehabilitation Act of 1973, you must first file charges with the appropriate Equal Employment Office representative or agency.*

X Other (Describe)

Retaliation

Wrongful discrimination

PARTIES

2. Plaintiff's name: Kinza Abdul Salaam

Plaintiff's address: 3808 Water Drop CT  
Street address or P.O. Box

Burtonsville, MD, 20866  
City/ County/ State/Zip Code

571 337 2563  
Area code and telephone number

3. Defendant's name: Transstates Airlines, LLC

Defendant's address: 11495 Navaid Road, Ste 133  
Street address or P.O. Box

Bridgeton, MO, 63044  
City/County/State/ Zip Code

314 222 4300  
Area code and telephone number

**NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES, ADDRESSES AND TELEPHONE NUMBERS ON A SEPARATE SHEET OF PAPER.**

4. If you are claiming that the discriminatory conduct occurred at a different location, please provide the following information:

Washington Dulles Airport, Washington DC  
(Street Address) (City/County) (State) (Zip Code)

5. When did the discrimination occur? Please give the date or time period:

04/2016 - (04-2016 - 4/2017)

ADMINISTRATIVE PROCEDURES

6. Did you file a charge of discrimination against the defendant(s) with the Missouri Commission on Human Rights?

☒ Yes Date filed: 10-2016 (10-4-2016)  
☐ No

7. Did you file a charge of discrimination against the defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

☒ Yes Date filed: 10-2016 (10-4-2016)  
☐ No

8. Have you received a Notice of Right-to-Sue Letter?

☒ Yes ☐ No

If yes, please attach a copy of the letter to this complaint.

9. If you are claiming age discrimination, check one of the following:

       60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

       fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

NATURE OF THE CASE

10. The conduct complained of in this lawsuit involves (check only those that apply):

☐ failure to hire me

☒ termination of my employment

☐ failure to promote me

☐ failure to accommodate my disability

☐ terms and conditions of my employment differ from those of similar employees

☒ retaliation

☒ harassment

☒ other conduct (specify): *Race - 3 suspensions received based on exclusive complain by caucasian co-employees with no investigation and solely based on their allegations - I, neither my testimonies were considered*

Did you complain about this same conduct in your charge of discrimination?

☒ Yes

☐ No

11. I believe that I was discriminated against because of my (check all that apply):

- ☒ race
- ☐ religion
- ☐ national origin
- ☒ color
- ☒ gender
- ☐ disability
- ☐ age (birth year is: \_\_\_\_\_)
- ☐ other:

Did you state the same reason(s) in your charge of discrimination?

☒ Yes

☐ No

12. State here, as briefly and clearly as possible, the essential facts of your claim. Describe specifically the conduct that you believe is discriminatory and describe how each defendant is involved in the conduct. Take time to organize your statement; you may use numbered paragraphs if you find it helpful. It is not necessary to make legal arguments, or to cite cases or statutes.

3/16 = <sup>First</sup> suspended for 3 days. Caucasian co worker reported that I carried an un-accompanied minor and disabled passenger on board aircraft prior to pre-flight. I explained and informed management that absolutely no such thing happened. I asked for full investigation to be done - none was done. I was suspended based on FALSE ALLEGATION By my co-worker. 3 days suspension without pay prevailed.

8/16 - Second suspension for 7 days - Caucasian United Airlines gate Agent and Caucasian Supervisor alleged that I was rude to the Tampa, Florida gate Agent. I contested the allegations. I give full detail in writing and provided evidence that I, instead, had filed a complaint on the gate Agent. Yet I was suspended based on 2 Caucasian's allegations with my full rebuttal with evidence was completely ignored, only theirs was considered.

I was also falsely accused by the company (Transstates Airline) that I had flown while ill on 8/7/16 which I proved was false, yet I again completely disregarded and 7 days without pay suspension prevailed.

(Continue to page 6, if additional space is needed.)



10/11/16 - I was removed from my scheduled trip which was for 4 days. This scheduled job related trip was scheduled for 12/8/16. I was flown to Company headquarters in St Louis, MO. I was told a passenger had complained about me while on a different trip. Even though all 3 crew members (Captain, First officer and myself) filed Inflight Trip Reports respectively, I was the ONLY one removed from upcoming scheduled trip to attend mandatory meeting in St. Louis. The other 2 crew members were Caucasian males.

I lost my scheduled 4 days trip. I considered this clear harassment and retaliation as I had then filed with EEOC and felt I was being retaliated against and discriminated against due to my race (African American) and gender (female) as the 2 white males were never taken off their trips. Their written trip reports were acceptable.

My wages had to be refunded based solely on the corroborating reports submitted by the 2 white males. If such had not taken place, I again was losing wages and technically, a suspension. My words were completely of no value. Only the Caucasian words carried value.

(Attach additional sheets as necessary).

10/13/16 - Subsequent trip reports completed due various passengers' incident. part of job routine.

10/13/16 - My trip report complained of the Transstates Continuation of CFR Regulations 8.14 CFR 14.14

13. The acts set forth in paragraph 12 of this complaint:

- ☐ are still being committed by the defendant.
- ☒ are no longer being committed by the defendant.
- ☐ may still be being committed by the defendant.

#### REQUEST FOR RELIEF

State briefly and exactly what you want the Court to do for you. Make no legal arguments;

cite no cases or statutes.

I would like the Court to seek on my behalf full restoration of pay and other benefits loss since my first suspension, beginning 4/2016 to Present. I also demand full re installation of my position as Flight Attendant, with all of my seniority and benefits, including a Diversity Program and Transstates Airlines Completing investigations, Submitting Full findings to parties concerned.

14. Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule

Atty - KINZA Abdul Salaam  
I also demand an expulsion of these ill-investigated findings out of my personnel file and a letter to that effect written to myself and the court upon completion.

I demand Full refund of ALL of the medical expenses that I incurred due to the mental and physical breakdown of my health due to the heavy unnecessary stress placed upon me.

I ALSO demand Maximum PAIN and SUFFERING COMPENSATION IMPOSED under the Civil Rights Act.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 8<sup>th</sup> day of September, 20 18.

Signature of Plaintiff

  
(Kinza Abdul Salaam)